

## REMARKS

By this amendment, Claims 1, 4–11, 14–16, and 19–20 are amended. No claims are added or canceled. Claims 1–20 are now pending in the application. The amendments to the claims as indicated herein do not add any new matter to this application.

Each issue raised in the Office Action mailed April 18, 2008, is addressed hereinafter.

### I. ISSUES RELATING TO CLAIM AMENDMENTS

Support for the amendments made to the claims can be found in at least the following paragraphs of the Specification.

Paragraph [0022]:

Client 104 includes a serialization/deserialization (SER/DES) module 112, a validation manager 114, a application runtime 116, one or more client application 118 and a metadata manager 120. These elements are described in more detail hereinafter.

Paragraph [0039]:

In step 502, client application 118 generates a request that conforms to a table-based data model supported by client application 118. For example, parameters of the request are expressed in name/value pairs.

Paragraph [0040]:

SER/DES module 112 examines parameters contained in the validated request and requests XML tag information from metadata manager 120 for each parameter.... SER/DES module 112 requests from metadata manager 120, the XML tag information for the component RSVP. SER/DES module 112 then generates an XML request for the configuration information for the

component using the XML tag information provided by metadata manager  
120.

Paragraph [0047]:

As illustrated by this example, client application 118 does not have to be “XML aware.” This means that client application 118 does not have to be aware of the specific XML tags or exactly how the hierarchical data model used by router 102 is organized. Instead, client application 118 operates using a data table model and the SER/DES module 112 handles generating XML requests that are sent to router 102 and XML replies that are received from router 102.

II. ISSUES NOT RELATING TO ANY CITED PRIOR ART.

A. CLAIMS 1, 4–6, 9–11, 14–16, 19–20—35 U.S.C. § 112, FIRST PARAGRAPH

Claims 1, 4–6, 9–11, 14–16, 19–20 are rejected under 35 U.S.C. § 112, first paragraph, for allegedly failing to comply with the written description requirement by failing to include disclosure for the term “non-XML request.” The rejection is rendered moot in view of the amendments made herein. Furthermore, present Claims 1, 4–6, 9–11, 14–16, 19–20 are in a form that satisfies all statutory requirements.

B. CLAIMS 6–10—35 U.S.C. § 101

Claims 6–10 are rejected under 35 U.S.C. § 101 for allegedly directed to non-statutory subject matter based on Paragraph [0058] of the disclosure. The disclosure and claims are amended to focus the description on “computer-readable storage media” rather than transmission media or carrier waves. Claim 6–10 therefore recited statutory subject matter. Reconsideration is respectfully submitted.

II. ISSUES RELATING TO CITED PRIOR ART: CLAIMS 1–20—SHAFER IN VIEW OF *SWEDOR*

Claims 1–20 are rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent No. 7,072,946, issued to Shafer (“*Shafer*”) in view of U.S. Patent No. 7,313,608, issued to Swedor (“*Swedor*”). Based on the following arguments, the rejections are respectfully traversed.

Independent Claim 1 recites:

receiving, at a client element from a client application, **a request that conforms to a table-based data model** to perform an operation on management data maintained by the router,

wherein the **client application is not XML-aware**, and

wherein **parameters of the request are expressed in name/value pairs**;

generating, by the client element, an XML request **based on the parameters of the request from the client application that is not XML-aware**;

(emphases added.) Because no combination of *Shafer* and *Swedor* teach or disclose at least the bold-faced features recited above in Claim 1, it is respectfully submitted that Claim 1 is patentable over *Shafer* in view of *Swedor*.

Claim 1 provides a client element receiving a request from a client application that is **not XML-aware**. The request has parameters that are expressed in name/value pairs, and the parameters form the basis generating, by a client element, the XML request.

No combination of *Shafer* or *Swedor* teach these features of Claim 1. Instead, in both references, XML requests are generated **directly** by the client. Neither *Shafer* nor *Swedor* disclose **first receiving a request from any non-XML-aware client application**, then based on the parameters that are expressed in name/value pairs from the request from the non-XML-aware client application, generating, by a client element, an XML request.

All client applications 56, 58, and 60 disclosed in *Shafer* are XML-aware because each of clients 56, 58, and 60 are able to communicate directly with the management server module's XML-based API, and are able to parse extensible markup language tags. (Col. 8, lines 43–65; Col. 9, lines 10–38.) For example, in *Shafer*, a user sends a command via client application 56, 58, or 60 to the router to initiate an “XML-mode.” (*Shafer*, Fig. 3, steps 40–46.) Thereafter, a client application directly “transmit[s] XML request.” (*Shafer*, Fig. 7, step 84.) “The client application then communicates directly with management server module 32 using the XML-based API presented by management server module 32...” (Col. 7, lines 62–65.) Furthermore, “CLI client 56 may take the form of a remote computer operated by a human user who enters CLI commands encoded with XML tags that conform to the API.” (*Shafer*, Col. 8, lines 49–51.)

Based on the foregoing, it is respectfully submitted that no part of *Shafer* teaches a client application that is not XML-aware, and no part of *Shafer* teaches receiving from the non-XML-aware client application a request with parameters that are expressed in name/value pairs, as recited in Claim 1.

*Swedor* fails to “fill the gaps” left behind by *Shafer*. *Swedor* also does not teach first receiving a request from a client application that is not XML-aware, then generating, by the client element, an XML request based on the parameters of the request from the client application that is not XML-aware, as featured in Claim 1. Instead, in *Swedor*, client 100’ directly “creates an XML request encoded in the format defined by DTD 202 but with parameters specific to the desired access or configuration,” and client 100’ “sends the document over the network 102.” (Col. 4, lines 4–9.) ***Swedor’s client 100’ is XML-aware***, as evidenced by client 100’’s ability to encode a request to interact with network device 104’ by directly “constructing an XML encoded document corresponding to the request an in accordance with a corresponding DTD.” (Col. 9,

lines 56–60.) *Swedor* does not teach or disclose receiving any request from any part of client 100' that is not XML-aware.

Based on the foregoing, because no combination of *Shafer* and *Swedor* teaches or discloses each and every express feature as recited in Claim 1, it is respectfully submitted that Claim 1 is patentable over *Shafer*, in view of *Swedor*.

Independent Claims 4–6, 9–11, 14–16, and 19–20 each include some form of the elements “receiving, at a client element from a client application, a request that conforms to a table-based data model,” “the client application is not XML-aware,” and “parameters of the request are expressed in name/value pairs,” as recited in Claim 1. It is respectfully submitted that Claims 4–6, 9–11, 14–16, and 19–20 are patentable over *Shafer* in view of *Swedor* for at least the reasons given with respect to Claim 1.

In addition, each of Claims 4–6, 9–11, 14–16, and 19–20 introduces one or more additional features that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of Claims 4–6, 9–11, 14–16, and 19–20 is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the independent claims. It is therefore respectfully submitted that Claims 4–6, 9–11, 14–16, and 19–20 are patentable over *Shafer* in view of *Swedor* for at least the reasons given above with respect to Claim 1.

Claims 2, 3, 8, 12, 13, 17, and 18 are dependent claims, each of which depends (directly or indirectly) on Claims 1, 6, 11, and 16. Each of Claims 2, 3, 8, 12, 13, 17, and 18 is therefore allowable for at least the reasons given above with respect to Claims 1, 6, 11, and 16. In addition, each of Claims 2, 3, 8, 12, 13, 17, and 18 introduces one or more additional features

that independently render it patentable. Due to the fundamental differences already identified, to expedite the positive resolution of this case, a separate discussion of the features of Claims 2, 3, 8, 12, 13, 17, and 18 is not included at this time. The Applicant reserves the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

### CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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